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Attorney for Defendant

United States District Court District of Alaska

United States of America,

Case No. 4:21-cr-024-RRB

PLAINTIFF,

v.

REPLY TO GOVERNMENT OPPOSITION

VINCE DELIGUIN,

DEFENDANT.

Mr. Deliguin has moved to continue his imposition of sentence for a brief period. The government has conditionally opposed, seeking further information about this request. Counsel has spoken with Mr. Deliguin about why he is requesting this brief continuance.

In essence, Mr. Deliguin does not 'feel' ready to proceed. Primarily, he seeks additional time to talk further with his counsel. He believes that he would be more ready to proceed if he had further time to talk with his counsel. He raised two issues he would

United States v. Vince Deliguin Case No. 4:21-cr-024-RRB Reply to Government Opposition Page 1 of 2 like additional time to discuss with counsel, his allocution and §3553(a) factors, but admits there could be more issues to discuss.

Counsel understands that the Court and the government likely wonder if this request is granted, will Mr. Deliguin seek to move this yet again. The answer to that question is "no" because as counsel for Mr. Deliguin, I am not going to request moving the imposition of sentence except in the event of an unanticipated occurrence that prevents me or Mr. Deliguin from being able to attend, such as illness or family emergency.

Counsel for Mr. Deliguin has contacted the government regarding the reasons for Mr. Deliguin's request. In light of the reason for Mr. Deliguin's request, the government does not oppose a brief continuance. The parties would be available in August to conduct the imposition of sentence. Counsel for Mr. Deliguin would prefer August 12 or August 19.

DATED this 8th day of July, 2022, at Anchorage, Alaska.

Steven M. Wells, PC Attorneys for Defendant

By: __/s/ Steven M. Wells _____ Steven M. Wells _____ ABA #0010066

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served **electronically** this 8th day of July, 2022, on:

All Parties of Record

_/s/ Steven M. Wells __.
Steven M. Wells, PC

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